

INVAPAY SINGAPORE PTE LTD

PRIVACY POLICY

When a person on their own behalf or on behalf of their employer or any company or organisation they represent (referred to in this policy as “you/your”) uses the Invapay Singapore Pte Ltd (referred to in this policy as “Invapay/we/our/us”) website to process business transactions for their own business or for a company or business entity or other entity they represent or are employed by, that person’s personal information (called “personal data” in this policy) is collected, processed and used by us when we process a transaction and for other purposes. In doing so we regard protecting your privacy as paramount.

This Privacy Policy sets out how we collect and use your personal data. We may change this policy in future so please revisit our website regularly to review the policy to be sure you are always up to date with it.

This Privacy Policy applies to individual users of our website and does not apply to company or business information not relating to an individual.

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By visiting our website and using our payment and execution services (services) you accept and consent to the practices contained in this policy.

For the purpose of the Personal Data Protection Act 2012 (the **Act**), our Data Protection Officer is Shawn Damon whose contact address is Invapay Singapore Pte Ltd Level 34, 77 Robinson Road, Singapore 068896, telephone +65 6809 2201.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms using our payments platform or our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our services through our platform or website, subscribe to our service, place or accept an order on our website or platform and when you report a problem with our service or our platform or website. The information you give us may include your name, address, e-mail address and phone number, and your company or entity name and address. This comprises information you voluntarily provide us by any means. Because of our contractual obligations we are not able to give you the option of not identifying yourself or using a pseudonym. Please also see the heading “Your Rights” below.
- **Information we collect about you.** With regard to each of your visits to our website or each time you use our platform we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); services and products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites or platforms we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site. We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- If you provide information about another person such as a supplier who is to be paid, you warrant you are authorised to do so and you will inform that person about us and that we will use and disclose their information as contained in this Privacy Policy.
- You must be careful to supply complete and accurate information to us otherwise we may not be able to provide you with our services.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:
 - to administer the relationship between you and us;
 - to carry out statistical analysis and business reporting, provided that the information is aggregated and de-identified such that no individual may be identified from that information even when combined with other information;
 - to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
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 - to notify you about changes to our service or to our contract terms and conditions;
 - to comply with any legal or regulatory requirements, or responding to regulatory enquiries or otherwise defending, preserving or establishing our legal rights;
 - to ensure that content from our website is presented in the most effective manner for you and for your computer.

- **Information we collect about you.** We will use this information:
 - to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical analysis and survey purposes;
 - to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in interactive features of our service;
 - as part of our efforts to keep our website safe and secure.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We may share your personal data with any member of our corporate group to enable us to provide services to you or your organisation.

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions relating to Buyers or Sellers as the case may be and other agreements; or to protect our rights, property, or safety, our customers, suppliers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The personal data that we collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or a member of our group of companies or for one of our suppliers. Such staff maybe

engaged in, among other things, the fulfilment of services supplied to you by us, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Only those of our employees (and our group companies' employees) or those of other entities or third parties who must have your personal data to comply with their responsibilities concerning the services provided by us to you are authorised to access or use your personal information. All Invapay group companies' employees must adhere to our privacy policies. Any employee violating these policies may be subject to disciplinary action which may include dismissal.

All our service providers and other third party contractors are subject to contractual obligations to ensure your personal information is safeguarded.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at the address shown below. **HOWEVER PLEASE NOTE THAT BY DOING SO YOU WILL NOT BE PERMITTED TO ACCESS OUR WEBSITE OR PLATFORM TO ENABLE US TO PROVIDE OUR SERVICES TO YOU OR TO PROCESS ANY TRANSACTIONS.**

Our website may, from time to time, contain links to and from the websites of our partner networks and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you and how it is processed. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a reasonable fee to meet our costs in providing you with details of the information we hold about you.

CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Data Protection Officer, Invapay Singapore Pte Ltd Level 34, 77 Robinson Road, Singapore 068896.

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